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July 11, 1996

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, D. C. 20554

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Re: Ex Parte - CC Docket 96-98
Implementation of the Local Competition Provisions
of the Telecommunications Act of 1996

Dear Mr. Caton:

This letter responds to the request of Mr. Stuart Kupinsky of the Policy and Program Planning Division of the Commission's Common Carrier Bureau to provide information on the operational requirements to provision wholesale services and unbundled network elements.

Services resale pursuant to Section 251(c)(4) differs significantly from provision of local service through use of unbundled ILEC network elements pursuant to Section 251(c)(3). As AT&T demonstrated in its comments (AT&T Comments, pp. 28 - 31; AT&T Reply Comments, pp. 13 - 14), a new entrant's provision of local services using unbundled network elements would enhance that entrant's ability to differentiate its services (and innovate) even while using ILEC facilities; facilitate that entrant's deployment of its own local infrastructure; and require that entrant to share in the risks of ILEC network investments. From the perspective of a new entrant's internal operations, use of unbundled network elements also would differ from the resale of LEC services. As requested by the Commission, the attached chart illustrates those differences.

While all of the differences in operational support arrangements specified in the attachment are appropriate and necessary, AT&T urges the Commission to ensure that other artificial and substantial barriers to the use of unbundled ILEC network elements are not permitted. In particular, if the ILECs could refuse to allow a new

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entrant efficiently to order, by way of a uniform service order code or other descriptor, combinations of unbundled network elements in a single consolidated order, or otherwise refuse to provide coordinated provisioning, maintenance, or record keeping for network elements that are ordered in combination, new entrants would be unable quickly and efficiently to use unbundled network elements to provide local exchange and exchange access services. No ILEC has identified any legitimate basis for refusing to perform these functions for network elements, and such a refusal could only be attributed to the ILEC's desire to make new entrant's use of unbundled network elements prohibitively costly and cumbersome.

In accordance with Section 1.1206(a)(1) of the Commission's Rules, two (2) copies of this Notice are being submitted to the Secretary of the FCC.

Sincerely,

Bruce K. Cox

Attachment

cc: Mr. Stuart Kupinsky

Services Resale	Unbundled Network Elements
Provisioning <ul style="list-style-type: none"> • Internal order issued to terminate end user billing and reflect CLEC as customer of record • Verification or update to service data bases, e.g., 911, directory listings, with customer information • Customer features and PIC provisioned when a change is required for either existing or newly installed customer 	Provisioning <ul style="list-style-type: none"> • Internal order issued to terminate end user billing and reflect CLEC as customer of record • Verification or update service data bases, e.g., 911, directory listings, with customer information • Customer features and PIC provisioned when a change is required for either existing or newly installed customer • Upgrade loop when required • Provision AIN triggers • Provision appropriate screening codes • Provision routing to specific platforms or adjuncts
Maintenance <ul style="list-style-type: none"> • CLEC issues trouble report to ILEC for resolution • ILEC provides CLEC status on troubles 	Maintenance <ul style="list-style-type: none"> • CLEC issues trouble report to ILEC for resolution • ILEC provides CLEC status on troubles
Billing <ul style="list-style-type: none"> • CLEC receives bill for services purchased from ILEC on an end user specific basis • CLEC receives daily detailed usage data from ILEC 	Billing <ul style="list-style-type: none"> • CLEC receives end user specific bill for end user-provisioned network elements, e.g., loop and switch • CLEC receives bill for network elements used in common based on unit of measurement • CLEC receives daily detailed usage data from ILEC • CLEC receives IXC specific usage for originating and terminating access traffic to end user • CLEC receives other CLEC and ICO usage necessary to bill mutual compensation, where applicable